

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re: § Chapter 11
FIELDWOOD ENERGY III LLC, *et al.*, § Case No. 20-33948 (MI)
§ (Jointly Administered)
Post-Effective Date Debtors.¹ §

ORDER SUSTAINING PLAN ADMINISTRATOR'S EIGHTH OMNIBUS OBJECTION
TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE AND
RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
SEEKING TO DISALLOW CERTAIN CLAIMS

(LATE FILED CLAIMS)

[Related Docket No. ____]

Upon the *Plan Administrator's Eighth Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure Seeking to Disallow Certain Claims (Late Filed Claims)* (the "Objection")² of the administrator of the chapter 11 plan (the "Plan Administrator") of the above-captioned reorganized debtors (collectively, the "Debtors," as applicable, and after the effective date of their plan of

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

reorganization, the “Reorganized Debtors”), seeking entry of an order (this “Order”) disallowing the Late Filed Claims identified on **Schedule 1** attached hereto, it is **HEREBY ORDERED THAT:**

1. Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rule 3007, each Late Filed Claim identified as a “Claim To Be Disallowed” on **Schedule 1** to this Order is disallowed in its entirety.

2. The Debtors’ Claims Agent is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Each claim and the objections by the Plan Administrator to each claim identified in **Schedule 1** constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Late Filed Claim.

4. Except as otherwise provided in this Order, nothing in this Order shall be deemed: (a) an admission as to the validity of any prepetition claim against a Debtor entity or such Debtor entity’s estate; (b) a waiver of any party’s right to dispute any prepetition claim on any grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Plan Administrator’s rights under the Bankruptcy Code or any other applicable law.

5. The Plan Administrator, the Claims Agent, and the Clerk of the Court are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Objection.

6. This Court shall retain exclusive jurisdiction to resolve any dispute arising from or related to this Order.

Dated: _____, 2022

MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

Schedule 1

Late Filed Claims

Schedule 1
Late Filed Claims

In re:Fieldwood Energy LLC, et. AL
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	856	20-33948 (MI) Fieldwood Energy LLC	Creditor: All Industrial Medical Services 855 Belanger Street, Suite 108 Houma, LA 70360	\$0.00	\$0.00	\$0.00	\$395.07	\$395.07
	Filed On:	12/3/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	857	20-33948 (MI) Fieldwood Energy LLC	Creditor: All Industrial Medical Services 855 Belanger Street Suite 108 Houma, LA 70360	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	Filed On:	12/3/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	851	20-33948 (MI) Fieldwood Energy LLC	Creditor: Berkley Oil & Gas 2107 CityWest Blvd 8th Floor Houston, TX 77042	\$0.00	\$0.00	\$0.00	\$1,053.00	\$1,053.00
	Filed On:	12/3/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	987	20-33948 (MI) Fieldwood Energy LLC	Creditor: Gulf Coast Chemical, LLC Attn: Jim Fusilier 220 Jacquelyn Street Abbeville, LA 70510	\$0.00	\$0.00	\$0.00	\$338.80	\$338.80
	Filed On:	9/22/2021						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						

Late Filed Claims

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In re:Fieldwood Energy LLC, et. AL
Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	842	20-33948 (MI) Fieldwood Energy LLC	Creditor: LARRY DOIRON, LLC ATTN: LARRY DOIRON PO BOX 1640 MORGAN CITY, LA 70381	\$0.00	\$0.00	\$0.00	\$860.00	\$860.00
	Filed On:	11/27/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	847	20-33948 (MI) Fieldwood Energy LLC	Creditor: LEWIS, CLAYBORYAN PLAINTIFF'S COUNSEL: BROUSSARD & DAVID, LLC P.O. BOX 3524 LAFAYETTE, LA 70502-3524	\$0.00	\$0.00	\$0.00	\$3,000,000.00	\$3,000,000.00
	Filed On:	12/1/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	982	20-33948 (MI) Fieldwood Energy LLC	Creditor: Martin International, Inc. 133 Woodland Dr. LaPlace, LA 70068	\$0.00	\$0.00	\$0.00	\$3,590.00	\$3,590.00
	Filed On:	8/24/2021						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	873	20-33948 (MI) Fieldwood Energy LLC	Creditor: Moody's Investors Service, Inc. c/o Duane Morris LLP Attn: Christopher R Belmonte / Pamela A Bosswick 230 Park Avenue Suite 1130 New York, NY 10169	\$0.00	\$0.00	\$0.00	\$145,000.00	\$145,000.00
	Filed On:	12/23/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						

Late Filed Claims

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Late Filed Claims

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Case No 20-33948 Jointly Administered

	Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claim To Be Disallowed	838	20-33948 (MI) Fieldwood Energy LLC	Creditor: Ominex Resources, Inc. 7950 John T White Road Fort Worth, TX 76120	\$122,684.68	\$0.00	\$0.00	\$0.00	\$122,684.68
	Filed On:	11/30/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	850	20-33948 (MI) Fieldwood Energy LLC	Creditor: PetroQuest Energy Attn: Angelle Perret 400 East Kaliste Saloom Road Suite 6000 Lafayette, LA 70508	\$0.00	\$0.00	\$0.00	\$28,026.22	\$28,026.22
	Filed On:	12/2/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	861	20-33948 (MI) Fieldwood Energy LLC	Creditor: Quorum Business Solutions (U.S.A.), Inc. 811 Main Street Suite 2200 Houston, TX 77002	\$0.00	\$0.00	\$0.00	\$1,311.73	\$1,311.73
	Filed On:	12/9/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						
Claim To Be Disallowed	849	20-33948 (MI) Fieldwood Energy LLC	Creditor: Texas Eastern Transmission, LP Katherine O'Connor 5400 Westheimer Court Houston, TX 77056	\$0.00	\$0.00	\$0.00	\$33,120.80	\$33,120.80
	Filed On:	12/2/2020						
	Applicable Bar Date:	11/25/2020						
	Comments:	Claim was filed after Applicable Bar Date.						

Late Filed Claims

Schedule 1
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In re:Fieldwood Energy LLC, et. Al.
Case No 20-33948 Jointly Administered

Claim #	Debtor	Name and Address of Claimant	Secured	Administrative	Priority	Unsecured	Total
Claims To Be Disallowed Totals		12	\$122,684.68	\$0.00	\$0.00	\$3,232,295.62	\$3,336,380.30